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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

November 30, 1999

Mr. Steven H. Wisness  
Office of Site Services  
U.S. Department of Energy  
P.O. Box 550, MSIN: A5-18  
Richland, Washington 99352



Dear Mr. Wisness:

Re: Response to Office of River Protection Letter 99-OPD-078, dated November 24, 1999, Requesting Ecology Approval of Alternative for Annual Integrity Assessment of Direct Buried Transfer Lines in Support of the Interim Stabilization Project

In your letter dated November 24, 1999, you requested the Washington State Department of Ecology (Ecology) approve the current controls as an integrity assessment of direct buried lines in lieu of annual leak testing pursuant to the requirements of Washington Administrative Code (WAC) 173-303-640(4)(I)(C). The requirements of WAC 173-303-640 do not apply in this case. The applicable requirement for annual leak testing is found in 40 Code of Federal Regulations (CFR) Subpart 265.193(i)(2). The Single-Shell Tank (SST) system is operated under interim status and, therefore, the leak testing requirements of WAC 173-303-640 do not apply. Ecology does approve the use of the current controls described in your letter (99-OPD-078) provided the data obtained for each previous year is reviewed and approved by an independent, qualified, registered professional engineer (IQRPE). ✓

The information to be reviewed for each direct buried transfer shall include, as a minimum:

1. The most recent leak test results and supporting data.
2. Material balance calculations performed every two (2) hours to assure that the volume pumped matches the volume received. This information shall include all transfers since the most recent leak test.
3. Recorded results of radiation surveys of each transfer line route performed every twelve (12) hours to identify any change in radiation levels that would be indicative of a leak.

Any time there is a twelve (12) month break in time since the last transfer through a line, there must be a leak test performed prior to startup of any transfer through that line.

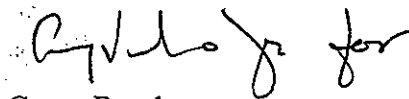
Ecology is aware the annual leak test date for one or more transfer lines is currently due. In order to ensure that interim stabilization pumping continues, we approve an extension to the end

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of January 2000 to complete the IQRPE review for transfer lines currently due. Failure to complete the IQRPE assessment by the end of January 2000 will require a halting of pumping through the applicable lines until such time that an adequate leak test or assessment is completed.

If you have any questions regarding this conditional approval, please feel free to contact me at (509) 736-3022.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Casey Ruud', followed by the word 'for'.

Casey Ruud  
Nuclear Waste Program

CR:sb

cc: Mary Lou Blazek, OOE  
Administrative Record: Single Shell Tanks